

# EXHIBIT G

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION**

Case No. 19-md-2875-RBK  
MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

**This Document Relates to All Actions**

**Declaration of Kyle Wright**

I, Kyle Wright, being competent, over the age of twenty-one (21), and authorized by Defendant Walmart Inc., state that I have personal knowledge of the following facts and hereby declare under penalty of perjury:

1. Sam's Club is a chain of membership-only warehouse clubs operated by subsidiaries of Walmart Inc. I have held the position of Sam's Club Associate Director of Membership Strategy and Implementation since 2021. In this role, I am responsible for membership operations and supporting clubs as they promote the advantages of Sam's Club membership to new and existing members. I have held other roles at Sam's Club during my twenty-seven years with the company.

2. I understand Plaintiffs are seeking contact information from Sam's Club membership records for those individuals who were dispensed certain prescription medications at Sam's Club pharmacies.

3. Sam's Club offers two tiers of membership: Club and Plus. Plus membership offers the same benefits as Club membership with additional advantages such as free shipping and

earning Sam's Cash. Membership is available to both businesses and individuals.

4. When membership is initiated, an individual is designated as the primary cardholder. The primary member may add a complimentary cardholder for someone residing in their household. The primary member may purchase add-on membership for up to 8 individuals under the Club membership or up to 16 individuals under the Plus membership, regardless of whether they reside with or work at the primary member.

5. The primary member provides a name, address, and phone number for themselves and for any complimentary and add-on cardholders. The primary member may, but need not, provide an email address for themselves and for any complimentary and add-on cardholders. The primary cardholder may provide the same email address for all cardholders on the membership. Email addresses are not validated to confirm whether they are legitimate or belong to the cardholder. Currently, fewer than half of new members provide an email address. This rate was much lower five to ten years ago.

6. Sam's Club generally does not require customers to prove that the membership card used at check-out belongs to them. In other words, the fact that a purchase is associated with a certain cardholder does not necessarily mean the cardholder was the purchaser.

Executed June 22, 2023 at Bentonville, Arkansas.



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KYLE WRIGHT